



Environmental Remediation Group

Olin Corporation

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SENT VIA ELECTRONIC MAIL

October 23, 2019

Ms. Melanie Morash
U. S. Environmental Protection Agency (USEPA), Region 1
5 Post Office Square, Suite 100,
Mail Stop OSRR07-4, Boston, MA 02109-3912

**RE: Proposal to Append the Ongoing Quarterly Monitoring Program
Olin Chemical Superfund Site (OCSS; "Site") – Wilmington, MA**

Dear Ms. Morash:

This letter proposes to add monitoring locations to the ongoing quarterly groundwater and surface monitoring program and append the analytes for better coverage of areas of concern as well as to better define the dense aqueous phase liquid (DAPL) extent. The proposed adjustments are based on the discussions between USEPA and Olin during the October 2 and 3, 2019 meetings as well as the recently obtained quarterly groundwater monitoring data. This letter also provides an update for the ongoing efforts to obtain access for the routinely monitored wells and the upcoming data gaps work plan implementation.

Proposed Additional Groundwater Monitoring Locations

Olin proposes to add the following wells to the ongoing quarterly groundwater monitoring program:

- GW-416D – This well is located immediately downgradient of the GW-413, which is north of the Site (Figure 1). GW-416BR is currently part of the quarterly monitoring program and adding GW-416D will help to better understand the interaction between deep and bedrock groundwater. Samples from GW-416D will be analyzed for analytes identified in USEPA's letter dated November 15, 2018.
- B-03; GW-3S; GW-4; GW-13; GW-14, GW-17S, GW-52S; GW-101; PZ-16RRm; PZ-17RR; and PZ18R – These are shallow monitoring wells and piezometers located along the East and South Ditch at the Site. Consistent with our discussions on October 2 and 3, Olin proposes to monitor these wells on a quarterly basis to better understand the quality of groundwater that is potentially entering East and South Ditch. Samples from these wells will be analyzed for ammonia, Bis (2-Ethylhexyl) phthalate (BEHP), N-nitrosodimethylamine (NDMA), sulfate, and total chromium. Note, other shallow wells in the area, GW-50S and GW-307, are part of the current quarterly monitoring program and will continue to be monitored.

Proposed Surface Water Monitoring Locations

A total of 7 surface water samples (Figure 1) will be collected quarterly from East and South Ditch. Surface water sampling locations include existing monitoring locations, ISCO 2 and ISCO 3, plus two additional locations along East Ditch and three locations along South Ditch. The proposed locations are contingent upon access. The collected samples will be analyzed for ammonia, BEHP, NDMA, sulfate, and total chromium.

Specific Gravity Analysis from Select Wells

As discussed and agreed on October 2 and 3, Olin will collect and analyze groundwater samples for specific gravity from the following wells [Figure 1], which are part of the ongoing quarterly monitoring program: GW-35D, GW-44D, GW-45D, GW-62D/BR/BRD, GW-70D, GW-83D,¹ and GW-202BRS. In addition, specific gravity will be collected from the following multiport wells: MP-1 (ports 1, 3, and 4), MP-2 (ports 1, 3, 4, and 6), MP-3 (ports 1, 2, 3, 4, 5, and 6), MP-4 (ports 2, 3, 5, 10, and 11), and MP-5 (ports 1, 2, 3, 6, 8, and 11)¹. The specific gravity will be measured using the lab method SM2710F. Note, as indicated during the meeting, specific gravity analysis was inadvertently omitted in the recently completed third quarter 2019 sampling event. Olin will collect for specific gravity data from sample locations noted above in future quarterly groundwater sampling events.

Other Topics – Access Agreements

- GW-413D – This well could not be sampled during the third quarter 2019 sampling event as the property ownership has changed. Olin is in the process of confirming contact information for the new property owner and will send an agreement requesting access to conduct groundwater sampling at this location. The well will be sampled only after an access agreement has been executed.
- GW-74D: This well could not be sampled during the third quarter 2019 sampling as it was paved over by City of Woburn and appears to have been destroyed. As this well is on the quarterly groundwater sampling, Olin will contact City of Woburn for access and schedule to install a replacement well as part of the data gaps work plan implementation.
- Olin is continuing to identify relevant property owners and prepare draft agreements to access private properties to implement the data gaps investigation work plan, which is pending USEPA review/approval.

¹ Well currently inaccessible due to high water levels in the Maple Meadow Brook (MMB) area. Olin is evaluating safe and viable means to access MMB area. The well will be sampled after identifying safe access to MMB area.

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Please respond to this letter with your concurrence with the recommendations above or let us know if you have any questions.

Sincerely,
OLIN CORPORATION

A handwritten signature in black ink, consisting of a stylized 'J' followed by a horizontal line.

James M. Cashwell
Director, Environmental Remediation

Enclosure

cc: Chinny Esakkipperumal (Olin)
Libby Bowen (Wood)

